

In the U.S. District Court for the District of Delaware

Xianhua Zhang
Plaintiff

Case No. 07-555

vs.

ING Direct
Defendant

Jury Trial Demanded

Plaintiff's Request for Production of Documents

Addressed to Defendant - Set No. 2

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiff Xianhua Zhang requests that Defendant ING Direct produce documents hereinafter described and permit Plaintiff to inspect them and copy them. Plaintiff requests that the documents be made available to Plaintiff at 212 Yorktown Court, Malvern, PA 19355 within **30** days from date of service hereof. This request is intended to cover all documents in the possession, custody, and control of any Defendant, Defendant's agents, employees, insurance carriers, and attorneys.

NOTE: A response of "will be supplied" or "will supplement" or "discovery is continuing" is not responsive. You have a duty to provide all items of which you are aware.

Definitions

"Document" or "documents" includes, without limitation, writings and printed matter of any kind and description, photographs, emails and drawings, notes and records of oral communication, and recordings (tapes, discs or other) of oral communication. In all cases where originals are not available, "documents" also means copies of original documents and copies of non-identical copies.

The documents covered by this request are as follows:

1. All documents related to those Defendant's former employees except Plaintiff with their contact information including but not limited to home address, email and home phone number who are discharged by Defendant between 8/1/2004 and 9/1/2006.
2. All documents related to those Defendant's current or former employees except Plaintiff with their contact information including but not limited to home address, email and home phone number who attended that routine company Probation Ending meeting held around 8/10/2005.
3. Copies of Termination/Separation Form for those Defendant's former employees including Plaintiff who are discharged by Defendant between 8/1/2004 and 9/1/2006.
4. All documents related to Mr. Dan Lu's annual performance reviews and salary adjustments from 10/2005 up to now.
5. All documents related to Plaintiff's discharge by Defendant except those sent to PA Bureau of UC Benefits and Allowances.

Date: 6/12/2008



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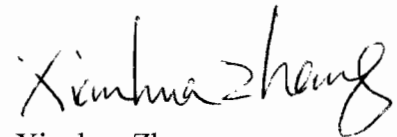
Xianhua Zhang
Xianhua Zhang

Plaintiff

CERTIFICATE OF SERVICE

I, Xianhua Zhang, hereby certify that true and correct copies of Plaintiff's Interrogatories Directed to Defendant Set 2 and Plaintiff's Request for Production of Documents Addressed to Defendant Set 2 have been electronically and timely mailed upon the following:

David P. Primack	David.Primack@dbi.com – Attorney for Defendant
David J. Woolf	David.Woolf@dbi.com – Attorney for Defendant
Edward N. Yost	Edward.Yost@dbi.com – Attorney for Defendant



Xianhua Zhang

Plaintiff

Date: 6/12/2008